

FILED 15 MAY '19 16:10 USDC-ORP

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

Brooklynn Clark

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Shelly Doe, Frankie Doe,
Tigard Police Department,
Megan Linn, and others (see attached)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. 3:19-cv-769-YY
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Brooklynn Clark
Street Address	P.O. Box 6898
City and County	Portland, Washington
State and Zip Code	Oregon 97228
Telephone Number	201-923-9617
E-mail Address	BrooklynnCharity@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Shelly Doe
Job or Title (if known)	
Street Address	11855 SW 91 st Avenue, #67
City and County	Tigard, Washington
State and Zip Code	Oregon 97223
Telephone Number	
E-mail Address (if known)	

Defendant No. 2

Name	Frankie Doe
Job or Title (if known)	11855 SW 91 st Avenue,
Street Address	11855 SW 91 st Avenue, #61
City and County	Tigard, Washington
	Oregon 97223

State and Zip Code

Oregon 97223

Telephone Number

E-mail Address
(if known)

Defendant No. 3

Name

Tigard Police Department

Job or Title

N/A - Agency

(if known)

Street Address

13125 SW Hall Boulevard

City and County

Tigard, Washington

State and Zip Code

Oregon 97223

Telephone Number

503.639.4171

E-mail Address

JenniferC@tigard-or.gov

(if known)

Defendant No. 4

Name

Megan Linn

Job or Title

Officer - Tigard Police Department

(if known)

Street Address

13125 SW Hall Boulevard

City and County

Tigard, Washington

State and Zip Code

Oregon 97223

Telephone Number

503.639.4171

E-mail Address

megan.linn@tigard-or.gov

(if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

Defendant No. 5

Community Partners for Affordable
Housing

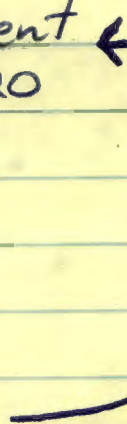
N/A - Non-Profit Organization
6380 SW Capitol Highway
Portland, Multnomah
Oregon 97239
503.293.4038
info@cpahinc.org

Defendant No. 6

Rachael Duke, Individually
Executive Director - C.P.A.H.
6380 SW Capitol Highway
Portland, Multnomah
Oregon 97239
503.293.4038
rduke@cpahinc.org

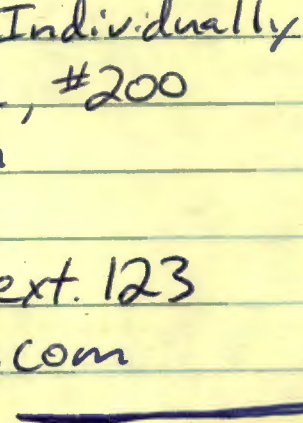
Defendant No. 7

Income Property Management
1800 SW 1st Avenue, #220
Portland, Multnomah
Oregon 97201
503.223.6327
info@ipmco.com
N/A - For Profit Organization



Defendant No. 8

Hillary Winslow, Individually
1800 SW 1st Avenue, #200
Portland, Multnomah
Oregon 97201
503.223.6327 ext. 123
hwinslow@ipmco.com
Portfolio Manager



Defendant No. 9

Elena Shayla, Individually ←
11905 SW 91st Avenue

Tigard, Washington

Oregon 97223

503.639.6514

greenburg_oaks@ipmco.com

Tigard Property Manager —

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Section 601 of Title VI of Civil Rights
Act of 1964 and violation of the
4th and 5th Amendments to the U.S. Constitution

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Brooklyn Clark, is a citizen of
the State of (name) Oregon.

b. If the plaintiff is a corporation

The plaintiff, (name) N/A, is incorporated
under the laws of the State of (name) N/A,
and has its principal place of business in the State of (name)
N/A.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Shelly Doe, is a citizen of
the State of (name) Oregon. Or is a citizen of
(foreign nation) N/A.

- b. If the defendant is a corporation
 The defendant, (name) Community Partners for Affordable Housing, is incorporated under the laws of the State of (name) Oregon, and has its principal place of business in the State of (name) Oregon. Or is incorporated under the laws of (foreign nation) N/A, and has its principal place of business in (name) N/A.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Damages are permanent and
unreversible. Medical + punitive
damages

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Def. #1 - Assaulted PTF; Def. #2 - lied about assault to
Figard PP; #3 - Denied me the right to press
charges against Def #1, for assaulting me; #4 -
decision maker that discriminated against me, #5, #6, #7, #8,
discriminated against me and unjustly evicted
me for assaulting Def. #1 without due process
and after I was the victim of assault not
the perpetrator.

Defendant #2

a. If the defendant is an individual

The defendant, Frankie Doe, is a citizen of the State of Oregon.

Defendant #3

b. If the defendant is governmental agency

The defendant, Tigard Police Department, is the police department for the city of Tigard, Oregon under the laws of the State of Oregon and has its principal place of business in the State of Oregon.

Defendant #4

a. If the defendant is an individual

The defendant, Megan Linn, is a citizen of the State of Oregon.

Defendant #5

b. See page 5

Defendant No. 6

a. If the defendant is an individual

The defendant, Rachael Duke, is a citizen of the State of Oregon.

Defendant No. 7

b. If the defendant is a corporation

The defendant, Income Property Management, is incorporated under the laws of the State of Oregon, and has its principal place of business in the State of Oregon.

Defendant No. 8

a. If the defendant is an individual

The defendant, Hillary Winslow, is a citizen of the State of Oregon.

Defendant No. 9

a. If the defendant is an individual
The defendant, Elena Shayla, is a citizen of the State of Oregon

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Medical Damages - \$1 million USD
 Loss of Income - \$200,000 USD
 Punitive Damages - \$1 million USD

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing May 15, 20 19.

Signature of Plaintiff

Printed Name of Plaintiff

Brooklyn Clark
Brooklyn Clark

B. For Attorneys

Date of signing: _____, 20____.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____